

ACCESS TO OPERATIONS SUPPORT SYSTEMS IN SOUTHWESTERN BELL TELEPHONE COMPANY

Legal Requirements

- “...in order to comply fully with section 251(c)(3) *an incumbent LEC must provide, upon request, nondiscriminatory access to operations support systems functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing of unbundled network elements under section 251(c)(3) and resold services under section 251(c)(4).* Incumbent LECs that currently do not comply with this requirement of section 251(c)(3) must do so as expeditiously as possible, but in any event no later than January 1, 1997.” CC Dkt. No. 96-98, First Report & Order at ¶ 525 (August 8, 1996).
- “Incumbent LECs must offer network elements on terms and conditions equally to all requesting carriers, and, where applicable, those terms and conditions must be equal to the terms and conditions on which an incumbent LEC provisions such elements to itself or its customers. Therefore, we held that the duty to provide nondiscriminatory access imposed by section 251(c)(3) and the duty to provide resale services under nondiscriminatory conditions imposed by section 251(c)(4) mandates equivalent access to OSS functions that an incumbent uses for its own internal purposes or offers to its customers or other carriers. *By January 1, 1997, to the extent that an incumbent LEC provides electronic pre-ordering, ordering, provisioning, maintenance and repair, or billing to itself, its customers, or other carriers, the incumbent LEC must provide at least equivalent electronic access to requesting carriers in the provision of unbundled network elements or services for resale that it is obligated to provide pursuant to an agreement approved by the state commission.*” (Emphasis added.) CC Dkt. No. 96-98, Second Order on Reconsideration at 9 (Dec. 13, 1996).

Preordering

- SWBT will provide CLECs with three forms of electronic access for preordering -- EASE, Verigate, and DataGate.
- EASE is the system SWBT service representatives use for preordering for its own retail customers.
- Verigate is a SWBT graphic user interface that operates on Windows™ and is available to those CLECs that do not have their own graphic user interface application.
- Verigate is used today by IXC's for preordering exchange access services, and has been enhanced for CLEC use.
- DataGate is a SWBT gateway that allows CLECs to preorder with their own graphic user

interface application.

- EASE, Verigate, and DataGate are each in operation and currently available to CLECs today to obtain preordering information on a real time basis, the same as SWBT.

Ordering/Provisioning -- Resale

- SWBT will provide CLECs with three forms of electronic access for ordering and provisioning resold services -- EASE, an Electronic Data Interchange (EDI) gateway, and Local EXchange (LEX).
- EASE is the system SWBT service representatives currently use to generate orders for its own retail customers.
- EASE is in operation and currently available to CLECs today for residential and most business customers (up to 30 lines) on the same basis as SWBT.
- Complex business orders -- e.g., multiline hunting, trunk groups, DID stations, etc. -- require manual processing by SWBT representatives, prior to input into the Service Order Retrieval and Distribution (SORD) system. CLECs may submit complex orders to the SWBT local service provider service center (LSPSC) for manual processing and input into SORD, in the same manner as such orders are handled by SWBT for its own customers. Upon request, SWBT will provide CLECs with the capability to input their own complex orders into SORD.
- EDI enables CLECs to electronically submit orders constructed from their own graphic user interface application.
- EDI is in operation and currently available to CLECs today for conversion, disconnects, and suspend orders. _____
- National EDI standards are being developed for directory listings, new connects, change of service, partial migrations, and complex conversions. SWBT is participating in the standards setting process. SWBT will make these capabilities available to CLECs on a negotiated basis as soon as they are developed and tested, both internally and with the CLECs.
- LEX is a SWBT graphic user interface that operates on Windows™ and will be available to CLECs which do not have their own graphic user interface application, or which may not have sufficient volumes to utilize EASE or EDI.
- LEX is being developed and is expected to become available in the second quarter 1997.

- EDI and LEX are based upon national Ordering and Billing Forum/Telecommunications Interface Forum (OBF/TCIF) standards developments.
- SWBT will also provide CLECs with an electronic interface -- Customer Network Administration (CNA) -- that will enable them to check the status of service orders.

Ordering/Provisioning -- Unbundled Network Elements

- Prior to February 8, 1996, SWBT did not offer unbundled network elements on a retail basis. Accordingly, no operations support systems functions for preordering, ordering, provisioning, maintenance and repair, and billing of unbundled network elements existed.
- Nonetheless, as of January 1, 1997, SWBT did make available an electronic interface for ordering and provisioning three (3) unbundled network elements for which national standards have been developed-- unbundled local loops, interim number portability, and switch ports.
- National standards for electronic ordering/provisioning of other unbundled network elements are in the process of being developed. SWBT is participating in the standards setting process and has taken a proactive approach to implement electronic interfaces for those unbundled network elements for which standards have been developed.
- SWBT will provide CLECs with two forms of electronic access for ordering certain unbundled network elements as standards become available -- an EDI gateway and Local EXchange (LEX).
- EDI enables CLECs to electronically submit new connect, change, disconnect, inside move, outside move, records change, and new CLEC conversion orders for unbundled local loops, interim number portability, and switch ports.
- EDI is available now, but on a negotiated basis due to the complex nature of the interfaces, mapping, and testing that must be done with the CLECs.
- LEX capabilities are expected to become available in the second quarter of 1997.

Repair and Maintenance

- SWBT will provide CLECs with access to two electronic systems for repair and maintenance --Customer Network Administration (CNA) and Electronic Bonding Interface (EBI).
- CNA is a SWBT system used today for business customers and IXC's, which has been enhanced and made available to CLECs.

- CNA enables the CLECs to electronically submit and check the status of trouble reports. In addition, it has the capability of initiating a mechanized loop test for resold plain old telephone service (POTS) lines and provide a trouble history to CLECs for those POTS lines.
- EBI is an industry standard for trouble reporting and status updates conforming to ANSI standards.
- EBI is currently in operation today for exchange access services, which has been enhanced for local exchange services and made available to CLECs.

Billing

- SWBT will provide CLECs with several forms of electronic access for billing -- Bill Plus Diskette, Customer Network Administration (CNA), EDI, and Exchange Message Record (EMR).
- SWBT will provide CLECs with a Bill Plus Diskette of consolidated bill data.
- SWBT will provide CLECs with access to CNA, which enables them to view billing information related to both resold services and unbundled network elements.
- SWBT will provide CLECs with an interface in an EDI format to receive billing information for their resold services from SWBT's Customer Record Information System (CRIS) database.
- SWBT will provide CLECs, on a negotiated basis, with an interface in an EDI format to receive billing information for their unbundled network elements from SWBT's Carrier Billing Access System (CABS).
- CLECs may have access to a daily feed for usage/toll billable records in a national standard EMR format.

TAB I

ATTACHMENT

SBC SUBMISSION TO DOJ
APRIL 29, 1997

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Vice President and
General Counsel

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April 29, 1997

Stuart Kupinsky
Telecommunications Task Force
Antitrust Division
U.S. Department of Justice
555 Fourth Street, N.W.
Washington, D.C. 20001

Re: SBC's Section 271 Application - Oklahoma

Dear Stuart:

Per your request, enclosed herewith as Attachment 1 are two documents related to the internal testing of SWBT's electronic interfaces. The first is a description of the testing which has been done and is planned for SWBT's EDI ordering gateway interface, and the second is a copy of the latest monthly progress report SWBT filed with the Texas PUC related to electronic interfaces. It should be noted that the information relating to the pre-ordering function included in the report is not related to EDI. AT&T will be using Datagate and EASE for pre-ordering since, as you will recall, EDI is only available for ordering and provisioning.

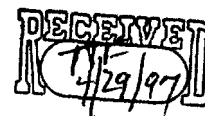
I am sure you are aware that AT&T and SWBT have not entirely agreed upon the current status of our electronic interfaces, as reported to the Texas PUC. The reasons for this are too complicated to address here. However, when we last talked, you indicated that you might want to receive a further briefing on the issue of internal testing of SWBT's electronic interfaces. SBC is prepared to have that discussion and to provide you with further information on the AT&T/SWBT disagreements at your convenience.

If you have any further questions, please call me.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Marty", written in dark ink.

Attachments



April 1997

SWBT EDI ORDERING GATEWAY INTERFACE TESTING

The development of SWBT's EDI Ordering Gateway and its associated "back office" systems involves 1) extensive internal testing within and between programs known as unit testing, 2) integrated testing between systems and 3) joint testing with a prospective user. SWBT has completed unit testing for all OBF/TCIF approved functions and much of the negotiated functions yet to be approved by national standards, has and continues to perform integrated testing, and will begin joint EDI testing with AT&T in April 1997.

Unit testing involves the validation of coding to ensure that programs meet the specification requirements. That is, expected data from a CLEC or front end system is simulated and is run through the programs to test format, field and data edits, and the relationship of such data. Examples of the specific unit testing performed includes the programs for editing the EDI records and proper EDI format, creation of the feed to the service order system, and the generation of Firm Order Confirmation (FOC) and Service Order Completion (SOC). Any problems encountered during this initial testing period were corrected and re-tested throughout the process.

Integrated testing is the process whereby data that has been unit tested is passed between systems to test the integrity and flow-through capability of the processes. To that end, SWBT has performed successful integrated tests between SWBT's EDI Ordering Gateway and certain back office systems then from these back office systems to the SWBT EDI Ordering Gateway. Internal integrated testing continues today to include all involved systems and to test the multitude of ordering scenarios and any new functionality that is added to the process.

A SWBT EDI Ordering Gateway quality assurance team has been established and is continually performing unit testing beyond the initial testing already completed by the programmers. The quality assurance team expands on the unit tests done by the programmers by simulating various ordering scenario possibilities expected for that system to make sure that the interface performs according to specifications. This team also works with other quality assurance teams and subject matter experts in the coordination of internal integrated testing and will become a focal point for coordination and problem resolution when joint testing begins with CLECs.

We have agreed to a three phased approach with AT&T to begin joint tests of SWBT's EDI Ordering Gateway for resold business accounts using both our test system facilities and our production systems beginning in April 1997. The first two phases will utilize test data and our test system to validate that requests can be received via EDI and passed to our back office systems. Creation of the FOC and SOC and passing this test data back to AT&T via the back office systems - EDI path will also be done using our test system. In the third phase, AT&T employee live accounts will become EDI trial data that will be processed in a production environment and will also include testing the service activation, maintenance/repair and billing processes. Once these joint tests for resold business accounts have been

successfully completed, we will coordinate with AT&T to set up additional joint tests to include residential resale and unbundled network element functionality.

**SWBT STATUS REPORT ON NEW ELECTRONIC INTERFACES
FOR PRE-ORDER AND ORDERING AND PROVISIONING FUNCTIONS FOR RESALE SERVICES**

FUNCTION (from AT&T Exhibit 15A)	SWBT AVAILABILITY (from AT&T Exhibit 15A)¹	SWBT STATUS REPORT AS OF FEBRUARY 15, 1997
		RESALE
PRE-ORDER		
Address Verification	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Service/Features Availability	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Telephone Number Assignment	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Dispatch Schedule	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Due Date	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Customer Service Record (CSR)	1/1/97C	Development of this functionality is complete for non-complex services. SWBT internal testing completed. Ready for testing by LSPs. ² Enhanced development continues to provide complex CSR information and additional fields by 5/15/97. Additional fields include IDENT, SA, LIST, SIC and BILL.

¹ AT&T and SWBT are working cooperatively to implement the functionality requires for the pre-ordering and ordering/provisioning interfaces by June 1, 1997 with testing capabilities available April, 1997. AT&T and SWBT are focusing on these interface availability dates in totality as opposed to the individual functionality dates in this column.

² "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/TCIF standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets. SWBT and AT&T have, at this point, agreed to a mutual test plan for the resale environment beginning with connectivity testing scheduled for 4/21 - 4/25/97, service order rules, EDI edits and message transfer 4/28 - 5/16/97 and a live trial 5/20 - 7/15/97.

³ On 2/6/97 additional requirements were identified for Bill-on situations. Programming to accommodate these new requirements has been reworked and is currently being tested internally.

⁴ SWBT and AT&T agreed on 2/6/97 to use SWBT USOCs and FIDs in lieu of incomplete national codesets. Mapping of USOCs and FIDs is being performed according to AT&T's priority list.

POTS ORDERING & PROVISIONING		
Migration (Convert Customer As Is)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
Migration With Changes (Convert with changes)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- Add/Disc Class Features	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- Add/Disc Blocking (1+, 0+, 011)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- PIC and PIC Freeze	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- Add/Disc Essential Lines	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- Add/Disc Additional Lines	1/1/97C	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- Directory Listing Changes	2/1/97C	Development of this functionality for straight line listings is complete. SWBT ready for internal testing for straight line listings. ³ EDI mappings for non-straight line listings have not been defined. AT&T and SWBT will mutually establish capabilities beyond straight-line testing outside of the implementation plan.
Partial Migration (Line/WTN vs. Account Level)	4/1/97- 7/1/97T	Business scenarios are same as full migrations. Development of the functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.

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³ On 2/6/97 additional requirements were identified for Bill-on situations. Programming to accommodate these new requirements has been reworked and is currently being tested internally.

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New connects		
- Single Line	2/1/97C	EDI mapping requirements received from AT&T on 1/13/97. Development of this functionality with straight line directory listings was completed on 2/1/97. SWBT is currently performing internal testing. ^{3,4}
- Multi-Line (Less Than 30 Lines)	2/1/97C	EDI mapping requirements received from AT&T on 1/13/97. Development of this functionality with straight line directory listings was completed on 2/1/97. SWBT is currently performing internal testing. ^{3,4}
- Projects (Large Job - add'l facilities/coordinated work effort required - need SWBT criteria)	7/1/97T	Pre-order information must be requested prior to sending a firm order via EDI. ^{3,4} Preliminary definitions of business scenarios and documentation provided to AT&T 3/6/97. Pending AT&T review.
Disconnects	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3}
Change Orders		
- Add/Disc Class Features	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. ^{3,4}
- Simple Number Change	3/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. ^{3,4}
- Add/Disc Blocking	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. ^{3,4}
- PIC and Local PIC Change	4/1/97C	Development of the functionality for PIC Change is complete. SWBT is currently performing internal testing. ³ Development of Local PIC Change functionality is complete and will be made available when equal access to IntraLATA toll is implemented.

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² "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/TCIF standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets. SWBT and AT&T have, at this point, agreed to a mutual test plan for the resale environment beginning with connectivity testing scheduled for 4/21 - 4/25/97, service order rules, EDI edits and message transfer 4/28 - 5/16/97 and a live trial 5/20 - 7/15/97.

³ On 2/6/97 additional requirements were identified for Bill-on situations. Programming to accommodate these new requirements has been reworked and is currently being tested internally.

⁴ SWBT and AT&T agreed on 2/6/97 to use SWBT USOCs and FIDs in lieu of incomplete national codesets. Mapping of USOCs and FIDs is being performed according to AT&T's priority list.

- Add/Disc Essential Lines	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. ^{3,4}
- Add/Disc Additional Lines	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. ^{3,4}
- Directory Listing Changes	4/1/97C	Development of this functionality for straight line listings is complete. SWBT ready for internal testing for straight line listings. ³ EDI mappings for non-straight line listings have not been defined. AT&T and SWBT will mutually establish capabilities beyond straight-line testing outside of the implementation plan.
- Suspend/Restore Non-Payment	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3}
- Suspend/Restore Vacation Svc.	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3}
Records Only Order	4/1/97C	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3,4}
T&F Order	4/1/97C	Development of this functionality is complete for T orders with a straight line directory listing. SWBT internal testing completed. Ready for testing by LSPs. ^{2,3,4} EDI mappings for non-straight line listings have not been defined.
NON-POTS SERVICE ORDERS		
PBX Trunks	6/1/97T	All pending issues related to business scenarios have been resolved. EDI mapping must be completed.
DID Trunks	6/1/97T	All pending issues related to business scenarios have been resolved. EDI mapping must be completed.

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² "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/TCIF standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets. SWBT and AT&T have, at this point, agreed to a mutual test plan for the resale environment beginning with connectivity testing scheduled for 4/21 - 4/25/97, service order rules, EDI edits and message transfer 4/28 - 5/16/97 and a live trial 5/20 - 7/15/97.

³ On 2/6/97 additional requirements were identified for Bill-on situations. Programming to accommodate these new requirements has been reworked and is currently being tested internally.

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Plexar	7/1/97T	Functionality is not achievable by target date. SWBT continues to be concerned about the difficulties of establishing an electronic interface which could support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. Function is pending mutual definition of business scenarios and subsequent changes to accommodate those scenarios.
Digiline/ISDN	7/1/97T	Functionality is not achievable by target date. SWBT continues to be concerned about the difficulties of establishing an electronic interface which could support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. Function is pending mutual definition of business scenarios and subsequent changes to accommodate those scenarios.
Semi-Public Phones	1/1/97C	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2,4}
MegaLink (T1.5)	7/1/97T	Functionality is not achievable by target date. SWBT continues to be concerned about the difficulties of establishing an electronic interface which could support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. Function is pending mutual definition of business scenarios and subsequent changes to accommodate those scenarios.
OTHER - SERVICE ORDER		

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COMPONENTS		
Multi -Line Hunting	4/1/97C	Documentation to define business scenarios and ordering requirements provided to AT&T 3/10/97. Pending review by AT&T. EDI mapping must be completed. ^{3, 4}
Preferential Hunting	3/1/97C	Documentation to define business scenarios and ordering requirements provided to AT&T 3/10/97. Pending review by AT&T. EDI mapping must be completed. ^{3, 4}
Transfer of Calls - Network Intercept	1/1/97	Development of TFC functionality is complete. For Disconnect orders, SWBT internal testing is completed and SWBT is ready for testing by LSPs. ^{2, 3, 4} SWBT is currently performing internal testing for TFC functionality associated with Change and T&F orders.
Toll Billing Exception (alternatively billed calls)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2, 3, 4}
Handicap Services	1/1/97	Handicap services on Change orders and New Connect orders will be effective when those order types are implemented. SWBT USOC/FID mapping in progress according to the AT&T product priority list. ^{3, 4}
ComCall	4/1/97C	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ^{2, 3, 4}
Future Expected Delivery Date (EDD)	4/1/97C	Development of this functionality is complete and available for any straight-line listing scenario.
Conversion When Final Bill Address Is Foreign PO	4/1/97C	Development of this functionality is complete. Ready for testing by LSPs. ^{2, 3}
DIRECTORY LISTINGS		
Directory Listing (Straight Line)		

¹ AT&T and SWBT are working cooperatively to implement the functionality requires for the pre-ordering and ordering/provisioning interfaces by June 1, 1997 with testing capabilities available April, 1997. AT&T and SWBT are focusing on these interface availability dates in totality as opposed to the individual functionality dates in this column.

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- White	2/1/97C	Development complete for straight line directory listings. Ready for internal SWBT testing. ³
- Yellow	N/A	
Directory Listing Other Than Straight Line		
- White	2/1/97C	EDI mappings for non-straight line listings have not been defined. ³ AT& T and SWBT will mutually establish capabilities beyond straight-line testing outside of the implementation plan.
- Yellow	N/A	
Directory Order Changes Prior to Publishing		
- White	N/A	
- Yellow	N/A	
Directory White Pages (Non-SWBT Areas)	N/A	
Directory Expedite		
- White	N/A	
- Yellow	N/A	
POST SERVICE ORDER EDI		

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TRANSACTIONS		
Supplemental Orders		
Firm Order Confirmation (FOC)	4/1/97C	Development of this functionality is complete. On 2/6/97 additional requirements were identified for Bill-on situations. Initial coding for Bill-on situations completed. SWBT internal testing in progress.
Jeopardies	?	SWBT will provide missed appointment information via the EDI 855 transaction. Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ² SWBT is exploring the data available for jeopardy information. A manual process to provide the information by phone, when and where available, is contemplated.
Rejects	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Order Completion	1/1/97	Development of this functionality is complete. On 2/6/97 additional requirements were identified for Bill-on situations. Initial coding for Bill-on situations completed. SWBT internal testing in progress.

¹ AT&T and SWBT are working cooperatively to implement the functionality requires for the pre-ordering and ordering/provisioning interfaces by June 1, 1997 with testing capabilities available April, 1997. AT&T and SWBT are focusing on these interface availability dates in totality as opposed to the individual functionality dates in this column.

² "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/TCIF standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets. SWBT and AT&T have, at this point, agreed to a mutual test plan for the resale environment beginning with connectivity testing scheduled for 4/21 - 4/25/97, service order rules, EDI edits and message transfer 4/28 - 5/16/97 and a live trial 5/20 - 7/15/97.

³ On 2/6/97 additional requirements were identified for Bill-on situations. Programming to accommodate these new requirements has been reworked and is currently being tested internally.

⁴ SWBT and AT&T agreed on 2/6/97 to use SWBT USOCs and FIDs in lieu of incomplete national codesets. Mapping of USOCs and FIDs is being performed according to AT&T's priority list.

TAB J

ATTACHMENT

LETTER FROM AT&T TO
DOJ REGARDING OSS
TESTING
APRIL 23, 1997



Jodie Donovan-May
Attorney

Room 3247G2
295 North Maple Avenue
Basking Ridge, NJ 07920
908 221-4227
FAX 908 953-8360

VIA FAX AND U.S. MAIL

April 23, 1997

Stuart Kupinsky, Esq.
United States Department of Justice
Antitrust Division
Telecommunications Task Force
555 4th Street, N.W., Room 8215
Washington, D.C. 20001

Dear Mr. Kupinsky,

This letter responds to your request of April 14, 1997 for information regarding the status of OSS testing between AT&T and SBC Communications. Please note that AT&T and SBC have not yet conducted any service readiness testing of SBC's EASE or EDI interfaces. AT&T plans to begin service readiness testing of these interfaces next month for resale service orders only.

AT&T is conducting some limited systems testing of SWB's DataGate gateway which to date has not involved the actual testing of customer "cases" which occurs in an actual service readiness test. AT&T also wishes to engage in electronic testing of UNE interfaces, but has not been able to plan any such testing because, as the March 14, 1997 statement of Nancy Dalton filed on behalf of AT&T in the Oklahoma state 271 proceeding explained, SBC's interfaces do not yet provide the support required for such testing.

- (1) The number of resale orders, broken down by consumer or business service, submitted to SBC via their EDI interface as of April 11, 1997:

Answer: None

- (2) The number of test UNE orders, broken down by UNE type (including platform footprint and platform subscriber line orders), submitted to SBC via their EDI interface as of April 11, 1997:

Answer: None



Stuart Kupinsky, Esq.
April 23, 1997
Page 2

(3) Any forecasts of when such tests would occur if the answer to (1) or (2) is "none":

Answer: AT&T plans to begin a service readiness test of SBC's EDI interface for resale orders on May 20, 1997 for 109 business cases with more than 380 testing scenarios. The test will last for 60 days. AT&T also plans to conduct a parallel test of SBC's Consumer EASE interface for resale orders during the same period.

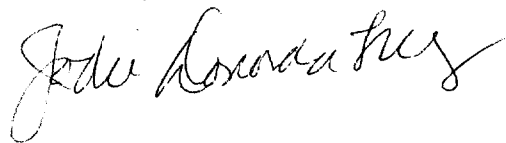
(4) Stage of testing AT&T is at with SBC relative to that with Ameritech:

Answer: In September 1996, AT&T began service readiness testing of Ameritech's OSS systems for consumer and business resale services in Illinois. It began service readiness testing of Ameritech's OSS systems in Michigan for consumer resale orders in late January 1997. In both instances, numerous problems arose which made it necessary for Ameritech to address the inadequacies identified in the testing process.

(5) Any results from such tests:

Answer: AT&T expects that it will have the first results of OSS testing with SBC within 30 to 60 days after it begins on May 20, 1997 the service readiness testing described above.

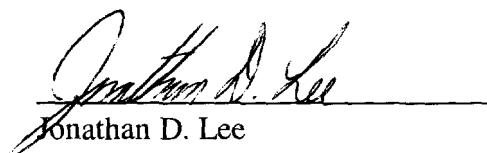
Sincerely,

A handwritten signature in cursive script, appearing to read "Jonathon Lee".

cc: Jonathon Lee, Esq.
Ms. Betsy Brady

Certificate of Service

I hereby certify that I am an Attorney for the United States in this proceeding, and have caused a true and accurate copy of the foregoing Evaluation of the United States Department of Justice to be served on all petitioners in this proceeding and other interested parties as indicated on the attached service list, by first class mail, on May 16, 1997.

A handwritten signature in cursive script, reading "Jonathan D. Lee", is written over a horizontal line.

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Telecommunications Task Force
Antitrust Division
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